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BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.

COMPUTER RESERVATION SYSTEM (CRS) REGULATIONS – Supplemental Advance Notice of Proposed Rulemaking	)	**Docket Nos. OST-97-2881, OST-97-3014, OST-98-4775**

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OST-97-3014-10
OST-98-4775-56

COMMENTS OF WORLDSPAN, L.P.

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September 22, 2000

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DEPARTMENT OF TRANSPORTATION
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COMPUTER RESERVATION SYSTEM (CRS) REGULATIONS – Supplemental Advance Notice of Proposed Rulemaking	)	**Docket Nos. OST-97-2881, OST-97-3014, OST-98-4775**

Dated: September 22, 2000

COMMENTS OF WORLDSPAN, L.P.

Worldspan, L.P. ("Worldspan") submits these comments on the Supplemental Advance Notice of Proposed Rulemaking ("SANPRM") published on July 24, 2000 (65 Fed. Reg. 45551), in which the Department invited additional comments on issues relating to its Advance Notice of Proposed Rulemaking ("ANPRM") regarding the Computerized Reservation System regulations set forth in 14 C.F.R. Part 255 ("Part 255").

I. INTRODUCTION

While Worldspan would prefer marketplace regulation to government intervention, Worldspan recognizes that appropriate regulation of CRSs and the other distribution channels may be necessary to balance the interests of consumers, CRSs and other information providers, and airlines. An appropriate level of regulation of CRSs, Internet sites and other sources of air transportation-related information and services can be beneficial in protecting consumers and preventing anticompetitive practices.

The Department's primary goal in dealing with electronic distribution of airline information and tickets must be to protect consumers and, in particular, to eliminate the possibility that consumers may be harmed by deceptive, misleading, biased and/or incomplete

schedule and fare information. The Department should also continue to protect competition in the airline and CRS industries. The goals of consumer and competition protection are paramount and exist irrespective of whether information is disseminated to consumers indirectly via CRSs and travel agents or directly via Internet sites. Likewise, those goals exist irrespective of whether traditional CRSs are owned by airlines or non-airlines.

In order to achieve these goals, the Department must

- apply the provisions of Part 255 to all CRSs, regardless of ownership, and to all other technologies that provide schedule and fare information and ticketing capabilities to ticket agencies; and
- take steps to ensure that consumers using Internet sites and other direct access technologies receive clear notice as to whether the sites provide objective, unbiased and complete information.

In addition, the provision by CRSs of complete and unbiased information to travel agents, consumers and others depends to a significant degree on the full and non-discriminatory participation of airlines in the systems. Healthy competition among CRSs likewise depends on the full participation of airlines and remains vital to healthy competition among airlines. Should the Department determine that continuation of its mandatory participation rule is warranted to meet these goals, the rule should be extended beyond CRS owner-airlines to include airlines that have any sort of marketing or promotional relationship with a CRS.

II. CRS REGULATIONS, TO THE EXTENT THAT THEY REMAIN NECESSARY, SHOULD NOT BE UNDULY BROAD OR UNDULY INTERFERE WITH THE MARKETPLACE

Worldspan does not oppose the regulation of CRSs or of Internet sites, but believes the Department should only maintain a level of regulation that achieves pro-consumer and pro-competition objectives while not unduly interfering with a vigorous and competitive market.

The overarching goal of the Department should be to protect consumers[1] against incomplete and biased information. That goal has become no less important with changes in the CRS industry and the development of other distribution channels. It is fair to say that neither the advent of direct consumer purchases of air transportation services via the Internet nor the changes in ownership of CRSs have reduced the need for the Department to ensure that consumers receive unbiased information and are not misled by deceptive practices. Indeed, it is precisely because more consumers than ever have access to a vast amount of transportation information and resources, without the filter of a professional travel agent, that the Department must remain vigilant in "preventing unfair, deceptive, predatory, or anticompetitive practices in air transportation." 49 U.S.C. § 40101(a)(9).

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[1] Worldspan uses the term "consumers" to mean generally those members of the public purchasing air travel through a ticket agent or via other technology (e.g., the Internet) for their own use, and would not include, for example, employees of a corporation buying airline tickets for business travel under special arrangements between a corporate travel department and a CRS or other source.

III. THE CRS REGULATIONS SHOULD APPLY EQUALLY TO ALL CRSs, REGARDLESS OF OWNERSHIP STRUCTURE

Regardless of who owns CRSs, the potential for unfair and deceptive practices remains. It is appropriate, therefore, to maintain regulations designed to protect consumers from the harmful effects of such practices. It is also appropriate for the Department to consider whether the current definition of "system" in Part 255 is sufficiently broad to capture all of the evolving technologies by which ticket agents may access schedule and fare information and make bookings for consumers, since all such technologies may raise consumer protection concerns.

The Department has found in the past that airline-owned CRSs have a potentially anti-consumer and anticompetitive incentive to favor their owners through biased displays and other favored treatment and that regulation is necessary to prevent such favoritism. If that continues to be the Department's position, then the Department must consider the fact that other, "non-ownership" types of CRS-airline relationships – such as marketing and promotional arrangements – give rise to the same or similar risks. Given the myriad of commercial relationships that may develop between CRSs and airlines, incentives exist for a non-airline owned system to favor one airline over another. A non-airline owned system has the ability and may have the incentive, for example, to bias its displays in favor of its commercial partners or against airlines with which it has no special commercial relationship.

Indeed, an unregulated CRS, regardless of its ownership, would have the freedom to "sell bias" to the airlines of its choice. A large, unregulated CRS also would be able to use its bargaining power to lock travel agencies into subscriber agreements of unlimited length. These are exactly the kinds of anticompetitive practices that led to the development of CRS regulations in the first place and should not be re-introduced into the market. See Carrier-Owned Computer

Reservation Systems, Final Rule, Docket No. 41686, 49 Fed. Reg. 32540, 32543 (August 15, 1984).

The Department concluded, in issuing the original Part 255, that the ownership of CRSs by airlines either had made or could make CRSs a competitive weapon with potentially harmful effects on consumers and competition. Carrier-Owned Computer Reservation Systems, Final Rule, Docket No. 41686, 49 Fed. Reg. at 32548. The Department has also recognized the harmful effects resulting from discrimination by system owners against other systems. In 2000, the Department must recognize that deceptive and anticompetitive practices may occur in the new and evolving ownership environment, in which a CRS may have incentives to favor a given airline or airlines – and in which an airline may have incentives to discriminate against a particular CRS – that are based on commercial factors other than ownership. The potential revenues that can be gained, for example, by selling preferential access or bias may present a strong incentive for CRSs and others to engage in deceptive and anticompetitive practices, regardless of ownership. Those types of behavior would certainly be adverse to the goals of robust competition and inconsistent with the intent of the antitrust laws, and would be within the jurisdiction of the Department to prevent through regulation. See Fair Displays of Airline Services in Computer Reservation Systems (CRSs), Final Rule, Docket No. OST-96-1639, 62 Fed. Reg. 63837, 63838 (Dec. 3, 1997).

Furthermore, the regulation of only those CRSs that are currently owned by airlines would produce an illogical result. If the applicability of CRS rules were based solely on ownership, the result would be that the largest CRS – SABRE – would be unregulated, while less sizable CRSs, such as Worldspan, would be regulated. In this situation, SABRE would be able to bias its displays while other CRSs would not. SABRE would be able to lock agencies in to

long-term contracts and other CRSs would not. Such a result would be arbitrary, irrational and contrary to the Department's goal of establishing regulations that increase competitive market forces in the CRS industry. Computer Reservation System (CRS) Regulations, ANPRM, Docket No. OST-97-2881, 62 Fed. Reg. at 47609. To impose regulatory requirements on the smaller CRSs while leaving the largest CRS to its own devices would reduce, not increase competition. In short, if the Department determines that the continued regulation of CRSs is warranted, then those regulations should apply to all CRSs, irrespective of ownership, in order to ensure the competitive integrity of the airline and CRS markets.

There is ample precedent for the Department to regulate CRSs that are not owned by airlines. The Department recognized in the rulemaking regarding parity clauses that airlines that market but do not own CRSs can engage in anticompetitive conduct. Computer Reservation System (CRS) Regulations, Final Rule, Docket No. OST-96-1145, 62 Fed. Reg. 59784 (Nov. 5, 1997). In continuing to permit systems to maintain parity clauses for system owners and marketers, the Department found that "[w]hile our past experience has involved airlines that either owned or were affiliated with an owner of a system, the same incentive to downgrade participation in competing systems could well exist in an airline that is marketing a system." Id., 62 Fed. Reg. at 59797.

Finally, Worldspan suggests that the Department closely examine whether the current definition of "system" in Part 255 will be adequate in the current and future environments. The definition of "system" must be broad enough to encompass all methods and technologies by which ticket agents access schedule and fare information and make bookings on carriers.

Worldspan, therefore, urges the Department – if the Department concludes that CRS regulation continues to be in the public interest – to amend its CRS rules to apply to all systems

(as appropriately re-defined) that are provided to travel agents, regardless of airline ownership or other affiliation.[2]

IV. DOT'S CONSUMER PROTECTION REGULATIONS SHOULD APPLY TO INTERNET SITES AND OTHER TECHNOLOGIES

A. Introduction

With the tremendous increase in bookings made directly by consumers via the Internet, regulations may be necessary to prevent the delivery of misleading information to consumers. Indeed, the direct-purchase environment of the Internet – and of other evolving technologies – can be very confusing and has a greater potential for consumer deception than existed in the traditional travel agency/CRS environment of the 1980's, when the CRS rules were first promulgated.

The Department's primary concern is whether consumers are receiving complete and unbiased information. This concern, and the remedies chosen to deal with it, should not be contingent upon what technology is used to interface with the public. Indeed, the goal of consumer protection transcends the different technologies used to deliver information to consumers. Thus, there can be little question that the Department should establish some regulatory framework to ensure that consumers are protected, keeping in mind that the Department should attempt to develop the minimum level of regulation possible to achieve its goals and not unduly burden the marketplace.

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[2] Part 255 should also be amended to add a definition of "system marketer." The definition should mean any relationship, beyond that of a participating carrier agreement, in which a carrier in any way markets or promotes a CRS, or otherwise has a special commercial relationship with a CRS. The definition should be broad enough to capture all types of behavior that might lead to adverse consequences for consumers or for competition.

The basic issues are twofold:

- What types of Internet sites and similar technologies should be covered by the regulations?
- What rules should apply to those sites and technologies that fall within the regulations?

B. What Sites Should Be Covered?

As a general proposition, the Department should apply the consumer protection principles of Part 255 to any Internet site or other evolving technology (e.g., wireless distribution) that purports to be an objective provider of air transportation information and related services. By regulating those purportedly objective sources of information and ensuring that the information that consumers receive is, in fact, objective, the Department would address practices that "tend to deceive a significant number of consumers." Fair Displays of Airline Services in Computer Reservation Systems (CRSs), Docket No. OST-96-1639, 62 Fed. Reg. at 63838. Such regulations would enable consumers to make a rational, informed choice when booking air transportation over the Internet and similar technologies.

Regulations designed to ensure objectivity are consistent with Department's statutory responsibility under Section 411 (now 49 U.S.C. § 41712) to ensure the public is provided with non-deceptive information. In that regard, the Department has recognized the important role played by sources of information that are directly available to the public and that the public expects to be neutral. See, e.g., Computer Reservation System (CRS) Regulations, Final Rule, Docket No. 47762, 57 Fed. Reg. 43780 (Sept. 22, 1992).

The challenge for the Department is to develop regulations that ensure that consumers can identify those sites and sources that are objective and those that are not. In this regard, the

Department may wish to consider an "objectivity disclosure" requirement, which would clearly alert consumers to those sites and sources that provide objective and unbiased fare and schedule information and those that do not.

C. What Rules Should Apply?

Because of the differences in technologies and in the respective markets of traditional CRSs and Internet providers of air transportation information, the Department should develop new rules for Internet sites and other technologies that incorporate the consumer protection principles of current Part 255. Worldspan believes that the following provisions of Part 255, appropriately amended, should apply to Internet sites and other technologies that purport to be objective sources of air transportation information:

- Parts 255.4(b)(1) and (2) and (c)(1) and (2): Schedule and fare information must not be ordered on the basis of carrier identity, and ordering criteria must be consistently applied. If Internet sites and other sources are able to bias displays to favor or punish particular airlines, consumers will be misled. Applying some form of these existing regulations is the bare minimum to provide protection to consumers from deceptive information.

- Part 255.4(d): Information from airlines that participate in an Internet site or other technology must be loaded on a uniform and non-discriminatory basis. Applying this regulation to "objective" Internet sites and other sources helps to remove the ability to favor one airline over others.

- Part 255.4(e): On-time performance information should be provided in a non-discriminatory manner. Again, this section is crucial to providing the direct-access customer the most complete and dependable information available.

- Parts 256, 257 and 258: Non-discrimination against code-share flights and mandatory disclosure of information concerning code-share flights and change of gauge flights should be included in the regulations applicable to Internet sites and other technologies. These requirements would maintain the current level of disclosure and would allow consumers to make informed choices.

As suggested above, in order to make these regulations most effective, and to assist consumers in distinguishing objective sites and sources from biased ones, the Department should also consider requiring those sites and sources that are not objective (i.e., that do not comply with the above regulations) to affirmatively disclose that their information is biased in favor of selected airlines.

D. Federal Preemption

Finally, as Worldspan has noted in previous comments,[3] federal preemption of the sale and distribution of airline services must be maintained. Whether distribution is via a traditional CRS, an Internet site or other technology, federal preemption is critical to preventing the development of inconsistent state regulation. By developing regulations covering Internet sites and other technologies, the Department will clarify that federal law and regulation preempt any attempts by state authorities to regulate Internet sites and other sources that provide air transportation information and related services.

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[3] Comments of Worldspan, L.P. on Advance Notice of Proposed Rulemaking, Docket OST-97-2881, filed Dec. 9, 1997, at 5-6.

V. SHOULD THE DEPARTMENT'S MANDATORY PARTICIPATION RULE CONTINUE, IT SHOULD BE EXPANDED TO INCLUDE MANDATORY AND EQUIVALENT PARTICIPATION IN OTHER CRSs BY SYSTEM MARKETERS

If the Department determines that the mandatory participation rule, 14 C.F.R. § 255.7, should continue in effect, Worldspan urges that the rule be amended to include system marketers. Certain parts of Part 255 already explicitly apply to system marketers. For example, Section 255.6(e) prohibits CRSs from requiring carriers to maintain a particular level of participation or buy enhancements, but carves out an exception for carriers that own or market a foreign or domestic CRS. As noted at page 6, supra, in addressing parity clauses, the Department recognized that system marketers as well as system owners have the incentive and ability to engage in anticompetitive behavior. That reasoning is no less valid in the context of the mandatory participation rule.

In addition, if the Department retains the mandatory participation rule, the Department should reiterate and clarify that participation includes the airline's participation in all functionality and enhancements in the system in which participation is mandated. Going further, and recognizing that some CRS-related distribution channels, such as Travelocity, may not fall within the definition of "system," the Department – if it retains the rule – should consider expanding the participation requirement so that, if a system owner or system marketer airline participates in a distribution vehicle, such as Travelocity, that is tied to a system with which the airline has an ownership or marketing relationship, the airline must also participate to an equivalent degree in other, similar CRS-related distribution channels.

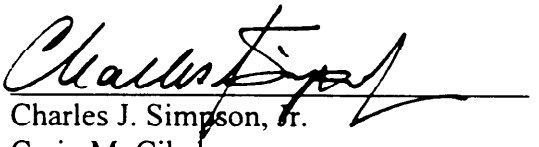
Finally as noted above, the Department should establish a definition of "system marketer" that includes any airline that maintains a relationship, beyond that of merely a participating carrier, with a CRS in which the carrier markets or promotes the CRS in any way.

VI. CONCLUSION

Protecting consumers from deceptive and misleading information should be the primary goal of the Department, and reasonable steps should be taken where needed to achieve that goal. Whether CRSs are owned by airlines or non-airlines, the Department should ensure that consumers and competition are not threatened by deceptive or unfair practices of the sort that led to the establishment of Part 255. Thus, to the extent that CRS rules remain necessary, Part 255 should be amended to apply to all CRSs, regardless of ownership. Likewise, if the Department determines that a mandatory participation rule continues to be needed, the rule should be expanded to encompass system marketers.

Furthermore, a consumer's need for protection from deceptive practices transcends the particular technologies used to deliver information. Thus, whether a consumer receives information via a CRS or via an Internet site or via another new and evolving technology, the consumer protection principles embodied in Part 255 should apply.

Respectfully submitted,



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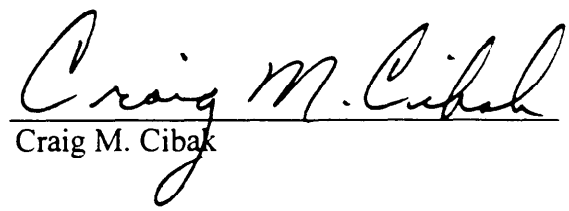

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